

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

MAGNABLEND, INC.	§	
Plaintiff,	§	CIVIL ACTION NO. 3:12-cv-01841-G
	§	
v.	§	
	§	
HARTFORD FIRE INSURANCE COMPANY,	§	
Defendant.	§	
	§	
-----	§	
	§	
HARTFORD FIRE INSURANCE COMPANY,	§	
Third Party Plaintiff,	§	
	§	
v.	§	
	§	
AMERICAN GUARANTEE AND LIABILITY	§	
INSURANCE COMPANY,	§	
Third Party Defendant.	§	

**THIRD-PARTY PLAINTIFF HARTFORD FIRE
INSURANCE COMPANY’S RESPONSE IN OPPOSITION
TO THIRD-PARTY DEFENDANT AMERICAN GUARANTEE AND
LIABILITY INSURANCE COMPANY’S RULE 12(b)(6) MOTION TO DISMISS**

Defendant/Third Party Plaintiff, Hartford Fire Insurance Company (“Hartford”) submits this Response in Opposition to Third-Party Defendant American Guarantee and Liability Insurance Company’s (“AGLIC”) Rule 12(b)(6) Motion to Dismiss (the “Motion”) Hartford’s Counterclaim and Amended Third Party Complaint (the “Amended Complaint”). In support thereof, Hartford respectfully states as follows:

As discussed in detail in Plaintiff’s Brief in Support of this Response, AGLIC’s motion is without merit and should be denied. The legal and factual grounds for denying AGLIC’s Motion to Dismiss are set forth in detail in the Brief in Support of this Response, filed contemporaneously.

PRAYER

WHEREFORE Defendant/Third-Party Plaintiff Hartford respectfully requests that this Honorable Court deny AGLIC's instant Motion, and grant such other and further relief to which it may be legally or equitably entitled.

Respectfully submitted,

MARTIN, DISIERE, JEFFERSON & WISDOM, L.L.P.

By: /s/ Christopher Martin
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ATTORNEYS FOR DEFENDANT/THIRD-PARTY PLAINTIFF, HARTFORD FIRE INSURANCE COMPANY

CERTIFICATE OF SERVICE

I hereby certify that I electronically submitted the foregoing document with the Clerk of Court for the United States District Court, Northern District of Texas, using the electronic case file system of the Court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

DATED: July 1, 2013

/s/Ryan K. Geddie
Ryan K. Geddie